

Message

---

**From:** LEE, LILY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D6085A744F9347E6836C54C0E85B97B2-LLEE06]  
**Sent:** 8/20/2018 4:18:52 PM  
**To:** Amy Brownell [amy.brownell@sfdph.org]; 'Brooks, George P CIV' [george.brooks@navy.mil]; 'Elizabeth Basinet' [elizabeth.basinet@NOREASINC.COM]; 'Henderson, Kim/SDO' [Kimberly.Henderson@jacobs.com]; Janda, Danielle L CIV [danielle.janda@navy.mil]; 'juanita.bacey@dtsc.ca.gov'; 'Koenig, Kellie/SDO' [Kellie.Koenig@jacobs.com]; 'matthew.wright@cdph.ca.gov'; 'McKinney, Kasheica (CII)' [kasheica.mckinney@sfgov.org]; Rachael Kagan [Rachael.kagan@sfdph.org]; Robinson, Derek J CIV NAVFAC HQ, BRAC PMO [derek.j.robinson1@navy.mil]; 'Singh, Sheetal (CDPH-EMB)' [Sheetal.Singh@cdph.ca.gov]; 'tina.low@waterboards.ca.gov'  
**Subject:** EPA response to SF Examiner and SF Chronicle questions re Parcel G Workplans  
**Attachments:** 2018-8-16 SF Examiner Responses Parcel G Workplan.docx

Attached are responses sent to Laura Waxman, SF Examiner, 8/16.

Below is question from Cynthia Dizikes, SF Chronicle, 8/17, and EPA's response 8/17:

We are writing about the EPA's criticism of the Navy's workplan and were hoping you could provide us with the URL to the attached letters/comments, as well as any other input the agency would like to offer about the problems it has with the Navy's proposed methodology for re-testing the shipyard, in general, and Parcel G specifically. Working on a very tight deadline. Story will go up online later this afternoon and will be in the paper tomorrow.

EPA Response sent 8/17:

The U.S. Environmental Protection Agency remains committed to ensuring that the Bayview-Hunters Point community is protected from exposure to radiation and that the Hunters Point Naval Shipyard (HPNS) Superfund site can be safely used for work, recreation, and residential purposes. The Navy is the lead on cleanup at this site, and the EPA and its state regulatory agency partners, e.g. the California Department of Toxics Substances Control (DTSC), oversee and enforce Navy compliance with Superfund law and other requirements to ensure the cleanup protects human health and the environment. The Federal Facilities Agreement among the Navy, EPA, and the State regulators sets out a procedure in which the Navy proposes draft plans and reports for regulators' comments.

Based on the high degree of potential falsification and data quality problems found on the HPNS site related to radiological work by Tetra Tech EC Inc., EPA, DTSC, CDPH and the Navy agree that comprehensive retesting is necessary. Retesting will start with Parcel G. In March 2018, EPA, DTSC, and California Department of Public Health (CDPH) proposed a scientifically driven retesting strategy that, if followed, is designed to provide confidence to the regulators and all the stakeholders regarding when Parcel G would be suitable for redevelopment. In June 2018, the Navy proposed its draft *Parcel G Removal Site Evaluation Work Plan, Former Hunters Point Naval Shipyard* to regulators and the public for comment. EPA's August 2018 comments on the June draft reinforce the EPA and state's March proposal for a multi-phased approach to retest every trench, building site, and building. After the workplan is finalized, field work can begin as soon as possible for retesting Parcel G. In the future, the Navy will also retest other parcels. The results of retesting will be an important step toward restoring confidence to residents and workers about progress toward future safe reuse of the property.

EPA's review comments, which we sent to the Navy on August 14, 2018, can be found here: <https://semspub.epa.gov/work/09/100009276.pdf>

Lily Lee

Cleanup Project Manager, Superfund Division  
US Environmental Protection Agency, Region 9  
75 Hawthorne St. (SFD-8-3)  
San Francisco, CA 94105  
415-947-4187